

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PHILIP KHOO,

Plaintiff,

v.

T-MOBILE USA INC., and  
JOHN DOES 1-25,

Defendants.

No. 2:22-cv-00132-JCC

STIPULATED MOTION AND  
[PROPOSED] ORDER TO  
EXTEND DEADLINE TO  
RESPOND TO COMPLAINT

NOTED FOR CONSIDERATION:  
March 28, 2022

**STIPULATION**

Pursuant to Local Civil Rule 10(g), Plaintiff Philip Khoo and Defendant T-Mobile USA, Inc., by and through their attorneys of record, stipulate to the Court's entry of the proposed order set forth below.

In support of this request, the parties represent the following:

1. Plaintiff filed this lawsuit on February 4, 2022 (Dkt. #1).
2. Defendant waived service of the Summons and Complaint on February 4, 2022, making its response to the Complaint due April 5, 2022 (Dkt. #8).
3. The parties have agreed to briefly extend the deadline for Defendant to respond to the Complaint from April 5, 2022 to May 6, 2022. The parties further request that the Court reset the deadlines for the FRCP 26(f) conference, initial disclosure deadline, and joint status report deadline to reflect the new deadline for Defendant to respond to the Complaint.

STIPULATED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT - (2:22-cv-00132-JCC) - 1  
4861-8847-0040v.2 0102559-000047

Davis Wright Tremaine LLP  
LAW OFFICES  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
206.622.3150 main · 206.757.7700 fax

4. This is the first extension requested by either party in this case.

5. The parties respectfully request that the Court enter the order set forth below, approving the requested extension.

DATED this 28<sup>th</sup> day of March, 2022.

BORIS DAVIDOVSKIY, P.C.

DAVIS WRIGHT TREMAINE LLP

By: s/ Boris Davidovskiy

Boris Davidovskiy, WSBA #50593  
6100 219<sup>th</sup> Street SW, Suite 480  
Mountlake Terrace, WA 98043  
Tel: 425.582.5200  
Fax: 425.582.5222  
[boris@davidovskiylaw.com](mailto:boris@davidovskiylaw.com)

*Attorney for Plaintiff*

By: s/ Rachel Herd

Stephen M. Rummage, WSBA #11168  
Rachel Herd, WSBA #50339  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
Tel: 206.622.3150  
Fax: 206.757.7700  
[steverummage@dwt.com](mailto:steverummage@dwt.com)  
[rachelherd@dwt.com](mailto:rachelherd@dwt.com)

*Attorneys for Defendant T-Mobile USA, Inc.*

### **ORDER**

Based on the foregoing stipulation, the Court ORDERS that Defendant's deadline to respond to the Complaint is extended to May 6, 2022 and states it will reset the deadlines for the FRCP 26(f) conference, initial disclosure deadline, and joint status report deadline to reflect the new deadline for Defendant to respond to the Complaint.

DATED this 29th day of March 2022.



John C. Coughenour  
UNITED STATES DISTRICT JUDGE

1 Presented by:

2 BORIS DAVIDOVSKIY, P.C.

DAVIS WRIGHT TREMAINE LLP

3  
4 By: s/ Boris Davidovskiy

Boris Davidovskiy, WSBA #50593

5 6100 219<sup>th</sup> Street SW, Suite 480

6 Mountlake Terrace, WA 98043

7 Tel: 425.582.5200

8 Fax: 425.582.5222

[boris@davidovskiylaw.com](mailto:boris@davidovskiylaw.com)

9 *Attorney for Plaintiff*

By: s/ Rachel Herd

Stephen M. Rummage, WSBA #11168

Rachel Herd, WSBA #50339

920 Fifth Avenue, Suite 3300

Seattle, WA 98104-1610

Tel: 206.622.3150

Fax: 206.757.7700

[steверummage@dwt.com](mailto:steверummage@dwt.com)

[rachelherd@dwt.com](mailto:rachelherd@dwt.com)

*Attorneys for Defendant T-Mobile USA, Inc.*